

ATTACHMENT A

EXEMPLAR ITEMS THAT WILL BE INCLUDED IN THE MOTION TO COMPEL IPP LEAD COUNSEL TO PRODUCE WORK PRODUCT AND OTHER DOCUMENTS FOR THE BENEFIT OF THE OMITTED REPEALER/NEW STATES AND TO PROMOTE THE EFFICIENT AND COST-EFFECTIVE RESOLUTION TO THE LITIGATION

1. All draft and final reports and the underlying data of all expert reports prepared by Netz¹ and all IPP consultants and all communications between Counsel and their experts;
2. All final expert reports and the underlying data of all expert reports prepared by defense experts as well as all drafts or consultant reports and all communications between Defendants and their experts as they may possess;
3. All draft and final trial exhibits, memos and motions in limine including, where applicable, all supporting documents²;
4. All deposition transcripts of the Defendants' Chief Executives and Vice Presidents for Marketing and Sales together with all accompanying exhibits;
5. A list of all other depositions taken;
6. A list of each document authenticated (if one exists);
7. All Executive Summaries prepared for the Board of Directors and for each Executive Officer for all Defendants during the period of the conspiracy.
8. The deposition transcripts and all exhibits for each Defendants CEO, Chairperson, and each Executive Vice Presidents for Marketing and Sales.
9. All documents evidencing when was the decision made to invest in any and all LCD plants before during or after the period of the alleged conspiracy.

¹ 2014 Expert Report of Janet S. Netz, PH.D Damage Study

² IPP Counsel have represented above that "preparations for trial including analyzing and culling the best evidence, exchanging expert reports, exhibit lists, deposition designations, jury instructions, Pretrial Statements, special verdict forms, briefing 64 motions *in limine*, and conducting multiple mock trials. *See generally*, ECF Nos. 4071-1; 4853-1 (¶¶ 40, 44, 46, 48, 49, 53-56); R&R at 33, 67-70.

- 1 10. All documents evidencing the amount of the investment in any and all LCD plants
- 2 before during or after the period of the alleged conspiracy.
- 3 11. All documents evidencing the timing of the elimination of CRT plants before
- 4 during or after the period of the alleged conspiracy.
- 5 12. All Minutes for each Defendants Board of Directors Meetings during period of the
- 6 alleged conspiracy;
- 7 13. The names and address of any member of any Board of Directors that served on the
- 8 Board of Directors for any competitor and the deposition transcript and all exhibits
- 9 for each such person;
- 10 14. Name and address of each and every investor in any of the Defendant companies
- 11 and/or their subsidiaries who owns more than 4% of any stock in any of the
- 12 competitors and the deposition transcript and all exhibits for each such person;
- 13 15. All and each investor reports including any minutes or recorded conversations
- 14 minutes of each investment meetings during period of the alleged conspiracy;
- 15 16. The minutes of each investment meetings during period of the alleged conspiracy;
- 16 17. The minutes of each investment meeting during period of the alleged conspiracy
- 17 between competitors;
- 18 18. All draft and final briefing on the issue of class certification including all draft and
- 19 finally selected supporting documents;
- 20 19. All draft and final briefing on the issue of summary judgement including all draft
- 21 and finally selected supporting documents;
- 22
- 23
- 24
- 25
- 26
- 27
- 28